

notes of the June 4 meeting reflect, the Shakopee felt this dissident lawyer had “tilted [the] playing field” by his contacts with DOI Deputy Secretary John Garamendi, with whom he had a relationship, and the Shakopee wanted the field “levelled out.” Collier proposed in his memo the specific means of achieving that goal: Fowler would inform Ickes of the tribe’s concern, and Ickes would then inform Garamendi at DOI.

Collier denied there was any linkage between the Shakopee’s June 4 contribution and their request for Fowler’s assistance, though he did not dispute that during the June 4 meeting the Shakopee representatives requested that Fowler ask Ickes to contact Garamendi, as indicated in Collier’s June 3 memo. He said the memo – which describes the tribe’s contribution history, its June 4 new contribution, its future giving interest and its pending need for assistance – was written at the request of a DNC staffer. Collier also maintained that the Shakopees raised multiple concerns in the June meeting – a claim that is squarely contradicted by every other witness who recalls the meeting, as well as Fowler’s notes of the meeting and Collier’s own briefing memo.

For his part, Fowler did not recall reaching out to Ickes or doing anything else on this issue, and remembered learning at some point that the matter had been resolved – though he cannot recall how or from whom he got that information. There is no evidence indicating that Fowler or the DNC took any action regarding this matter after the June 4 meeting. Interior Solicitor John Leshy informed the tribal dissidents by a letter dated June 19, 1996, that DOI (the Secretary) had decided not to undertake a review to reconsider approval of the adoption ordinance. There is no evidence, however, that this decision was influenced by the White House or the DNC. Nonetheless, the Shakopee’s interaction with Fowler tends to corroborate that there